

Exhibit 3

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN

BENJAMIN W. PILLARS, as
Personal Representative for the
Estate of KATHLEEN ANN PILLARS, Case: 1:15-cv-11360-TLL-PTM
Deceased, Honorable Thomas J. Ludington

Plaintiff,

v.

GENERAL MOTORS LLC,

Defendant.

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DEFENDANT GENERAL MOTORS LLC'S
MOTION TO EXTEND PAGE LIMIT

Defendant, General Motors LLC, by its attorneys, Bowman and Brooke LLP, moves this Court for an order extending the page limit in excess of the 7-page limit imposed by L.R. 7.1(d)(3)(B) for Defendant's Reply Brief in Support of Its Motion for Leave to File Amended Notice of Removal and Amended Answer to Complaint and, for the following

reasons, this motion should be granted:

1. On July 17, 2015, Defendant General Motors LLC filed a Motion for Leave to File Amended Notice of Removal and Amended Answer to Complaint, seeking relief to correct an inadvertent factual error made in the original pleadings filed by Defendant in this case.

2. Plaintiff's response to Defendant's Motion for leave is lengthy and raised a number of arguments that Defendant must address in its Reply brief, which is being filed contemporaneously with this Motion, including a 29 page transcript of a hearing in the Bankruptcy Court.

3. Due to the complexities of this case, the importance of the outcome of this Motion to both parties, and in order to provide a meaningful Reply to Plaintiff's Response brief, Defendant's Reply brief – excluding the caption, Tables of Contents and Authorities, Concise Statement of Issues Presented and Certificate of Service – is 12 pages.

4. Defendant requests that this Court extend the seven-page limit in L.R. 7.1(d)(3)(B) and allow it to file a 12 page reply brief.

WHEREFORE, Defendant General Motors LLC respectfully requests that this Honorable Court enter an Order extending the page limit for Defendant's Reply Brief in Support of Its Motion for Leave to File Amended Notice of Removal and Amended Answer to Complaint and allowing 12 pages, exclusive of the caption, Tables of Contents and Authorities, Concise Statement of Issues Presented and Certificate of Service.

Respectfully submitted,

Bowman and Brooke LLP

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CERTIFICATE OF SERVICE

I certify that on July 23, 2015, I electronically filed the foregoing paper with the Clerk of the Court using the ECF system which will send notification of such filing to the following:

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